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*Counsel to Fundación Rafael Dondé, I.A.P.*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

MIAMI METALS I, INC., *et al.*,

Appellees.

FUNDACIÓN RAFAEL DONDÉ, I.A.P., *et al.*,

Appellant,

v.

MIAMI METALS I, INC., *et al.*,

Appellees.

Civil Case No. 1:19-cv-06610-(KPF)

Lead Bankruptcy Case No. 18-13359 (SHL)

**STIPULATION AND ORDER FOR  
SUBSTITUTION OF COUNSEL**

**IT IS HEREBY STIPULATED AND ORDERED** that Fundación Rafael Dondé, I.A.P.

(the “Foundation”) hereby substitutes as its counsel of record in the above-captioned appeal:

TOGUT, SEGAL & SEGAL LLP (“TSS”)

One Penn Plaza, Suite 3335

New York, New York 10119

Attention: Frank A. Oswald, Esq.

Kyle J. Ortiz, Esq.

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in place of and instead of Richard F. Hans, Richard A. Chesley and Rachel Ehrlich Albanese of  
DLA Piper LLP (US), 1251 Avenue of the Americas, New York, New York 10020-1104  
("DLA Piper").

TSS shall serve as counsel for the Foundation with respect to all matters in this appeal.  
DLA Piper shall be removed from all service lists and the Court's electronic notice system.

Dated: November 21, 2019

**FUNDACIÓN RAFAEL DONDÉ, I.A.P.**

/s/ Eduardo Dondé  
Eduardo Dondé

Dated: November 21, 2019

**DLA PIPER LLP (US)**

/s/ Rachel Ehrlich Albanese  
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*Former Counsel to Fundación Rafael Dondé,  
I.A.P.*

Dated: November 21, 2019

**TOGUT, SEGAL & SEGAL LLP**

/s/ Frank A. Oswald

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*Counsel to Fundación Rafael Dondé, I.A.P.*

Dated: November 21, 2019

**AKERMAN LLP**

/s/ Katherine C. Fackler

Steven R. Wirth

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*Counsel to Miami Metals I, Inc., et al.*

SO ORDERED:

Dated: November \_\_, 2019

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HONORABLE KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE